

## REMARKS

In response to the Office Action dated September 14, 2007, Applicants respectfully request reconsideration and withdrawal of the rejection of the claims.

All pending claims were rejected under 35 U.S.C. §103, on the basis of the DeRose et al. patent (U.S. 6,055,544), in view of the Walls et al. patent (U.S. 5,848,410). While each of these patents discloses the generation of a table of contents (DeRose) or an index (Walls), it is respectfully submitted that the mechanisms for doing so that are disclosed in the patents are different from the method and system recited in the rejected claims.

More particularly, the claims that have been presented for examination define the manner in which the dynamic generation of a table of contents is tied to hierarchical storage of files and folders in a file system. For example, Figure 11 of the present application illustrates the structure of an online help system, in which a general Help folder 1110 contains other folders 1140 and 1150 that are associated with topics of interest on which help information can be obtained. In this particular example, the folder 1140 contains help information relating to a computer operating system, and the folder 1150 contains help information relating to a word processing application. An example of the information contained in the folder 1140 is illustrated in Figure 13. Among the files at the first hierarchical level within the folder 1140 is an HTML file 1340 that is used to dynamically generate a table of contents for the topic associated with the folder 1140, and a template file 1350 that is employed to lay out the table of contents. Thus, the information that is needed to dynamically generate the table of contents for a selectable item of interest is contained at the first hierarchical level within a folder that is designated for that topic.

Claim 62 recites a method for displaying information topics that are available via an online help system. As originally presented, this claim recited the step of storing one or more HTML source files of information for a given topic "in a designated folder associated with that topic". Thus, the claim recited the relationship between a help topic and a particular folder associated with that topic. Claim 62 recited the further steps of selecting the folder associated with a topic of interest, and searching each of the files "at a first hierarchical level in the selected folder" to identify files of a predetermined type. Thus, when the user selects a folder that is associated with a particular topic of interest, files at the first hierarchical level of *that* folder are searched for certain information, and the files containing that information are identified. Then, according to the next step of claim 62, those identified files are examined to locate HTML metatags that pertain to the display of help information. These metatags are then used to generate an HTML file that is displayed to provide a table of contents for the topic of interest associated with the selected folder. Claim 62 has been amended to make even more explicit the relationship of the folders to the generation of a table of contents.

Claim 70 is directed to a system that implements this procedure. It recites a memory storing a hierarchy of folders and files, "wherein the folders respectively correspond to different topics of information..., and HTML files at the first level of hierarchy within said folders contain metatags associated with data relating to the display of a table of contents for the respective topics to which the folders correspond." Thus, claim 70 also recites the relationship between the folders associated with the topics, files at the first level of hierarchy of these folders, and the generation of a table of contents.

It is respectfully submitted that the DeRose and Walls patents do not disclose, nor otherwise suggest, a mechanism that employs folders and files in such a manner to dynamically generate a table of contents, or an index. Furthermore, it is noted that, in setting forth the rejection, the Office Action does not address this particular aspect of the claimed subject matter. For instance, the first step of claim 62 comprises “storing one or more HTML source files of information for a given topic *in a designated folder associated with that topic.*” In addressing this recitation, the Office Action refers to the Operation Manual of the DeRose patent as a source document. It does not, however, discuss the manner in which the DeRose patent can be interpreted to disclose the italicized portion of the claim language quoted above. There is no showing that source files of information for different topics are stored in the designated folders that are associated with those topics. For instance, there is no disclosure that the different chapters of DeRose’s book are associated with different respective folders. Rather, it appears that the entire structure of the book is contained in a single SGML file. There is no disclosure in the DeRose patent of a relationship between topics of information and respective folders that are associated with those topics.

Another step recited in claim 62 is that of “searching each of the files *at a first hierarchical level in the selected folder* to identify files of a predetermined type”. The Office Action acknowledges that the DeRose patent does not disclose this claimed subject matter, and refers to the Walls patent at column 12, lines 13-22. It is respectfully submitted that this passage in the patent does not disclose that files at a first hierarchical level of a folder are searched to identify those of a predetermined type. Rather, the paragraph beginning at column 11, line 62, states that a file-

system definer analyzes the file system to determine the particular type of format in which files in the file system are written. The cited passage at column 12, lines 13-22, states that this determination can be achieved by looking for certain file extensions on the files, to eliminate those which are irrelevant. There is no disclosure indicating that the files to be searched are located within a folder associated with a topic of interest that has been selected. Nor does not it disclose that files at the first hierarchical level of such a folder are searched. Like the DeRose patent, the Walls patent does not disclose the use of folders, and files stored at the first hierarchical level of such folders, as a mechanism for the dynamic generation of a table of contents, or an index.

It is noted that the Office Action does not address the subject matter of claim 70. As discussed previously, this claim recites a memory storing a hierarchy of folders and files. The claim further recites that the folders respectively correspond to different topics of information that can be viewed within a help system, and that HTML files at the first level of hierarchy within those folders contain metatags associated with data relating to the display of the table of contents. The Office Action does not identify any subject matter in either of the two references that is considered to correspond to these claimed features. If the rejection of claim 70 is not withdrawn, the Examiner is requested to explain, with particularity, where the references disclose:

1. A memory storing a hierarchy of folders and files;
2. That the folders in such a hierarchy correspond to different topics of information within a help system; and

3. HTML files at the first level of hierarchy within such folders contain metatags associated with a table of contents.

In the absence of such a showing, it is respectfully submitted that the rejection cannot be maintained.

In addition to the foregoing differences, the dependent claims recite other distinguishing features of the invention. For example, claim 63 recites the step of filtering the identified files to select those having a predetermined designation, and claim 64 recites that this predetermined designation is a creator designation. The Office Action alleges that the DeRose patent discloses this subject matter at column 12, lines 1-18. However, this portion of the patent does not contain any disclosure relating to the identification of a file according to its creator. Rather, it discusses an element locator, which is defined as a reference to an element within a referenced document. The cited passage discloses that the element locator can be a number, or a numerical string that functions as an index. There is no disclosure pertaining to the designation of a file according to its creator.

The rejection of claim 64 also refers to U.S. Patent No. 5,557,722, at Figure 15 and column 3, lines 28-40. The reference to this patent is not understood. The cited passage relates to the assignment of type names for each element in an electronic document. There is no discussion of designating a file according to its creator.

Accordingly, if the rejection of claim 64, and corresponding claim 72, is not withdrawn, the Examiner is requested to explain how the patents are being interpreted to suggest the designation of a file according to its creator.

Claim 67 defines the steps by which the HTML file is generated. These steps include retrieving a stored template file, duplicating the contents of the template file, and “replacing tokens in said file, that correspond to the located metatags, with the associated data from the metatags that were located in each identified file, during said duplicating step.” In rejecting this claim, the Office Action interprets the style sheets, described in columns 15 and 16 of the DeRose patent, as corresponding to the claimed template file. Even if this interpretation is accepted, for the sake of argument, it is respectfully submitted that the DeRose patent does not disclose the steps recited in claim 67. In particular, it does not disclose that a style sheet is duplicated, nor that during such duplication, tokens in the style sheet are replaced with data from metatags that were located in identified files. Rather, the patent discloses that the style sheets function as mapping tables, which define a style for each document type. (Column 16, lines 15-37). There is no disclosure that a style sheet is duplicated. Nor is there any disclosure that contents of a style sheet are replaced with data from metatags. Accordingly, it is respectfully submitted that the DeRose patent does not suggest the subject matter of claim 67, or corresponding claim 75.

Since the DeRose patent does not disclose the subject matter of claims 67 and 75, it cannot be interpreted to suggest the subject matter of claims 68, 69, 76 or 77, which depend from either claim 67 or claim 75.

In summary, the pending claims define a mechanism for dynamically generating a table of contents for a topic that has been selected by a user. This mechanism employs folders associated with the respective topics and HTML files located at the first hierarchical level of such folders. These files contain metatags

that provide data to be employed in the generation of the table of contents. It is respectfully submitted that neither the DeRose nor Walls patents, nor any reasonable combination thereof, suggest such a relationship between folders, files stored in the folders, and the generation of a table of contents.

Reconsideration and withdrawal of the rejection, and allowance of all pending claims is respectfully requested.

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

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By: /jamesalabarre/  
James A. LaBarre  
Registration No. 28632

P.O. Box 1404  
Alexandria, VA 22313-1404  
703 836 6620